

CORRES. CONTROL
OUTGOING LTR NO.

DOE ORDER #

04 RF 01107



DIST. LTR ENC

DIETER, T. J.		
FERRERA, D.W.		
LINDSAY, D. C.		
LONG, J.		
LYLE, J. L.		
MARTINEZ, L.A.		
PIZZUTO, V.M.		
SHELTON, D.C.		
SPEARS, M.S.		
TUOR, N.R.	x	x
<i>DeVito, D.</i>	x	x

October 28, 2004

04-RF-01107

<i>Holmes, A.</i>	x	x
<i>Carmon, M.</i>	x	x
<i>Henderson, B.</i>	x	x
<i>Kury, R.</i>	x	x
<i>Vaughn, T.</i>	x	x
<i>Fass, D.</i>	x	x
<i>Gaube, M.</i>	x	x
<i>Hicks, C.</i>	x	x

RFPO Project Management
Joseph A. Legare, Director
Project Management Division
DOE-RFPO

TRANSMITTAL OF MINOR MODIFICATION #3 TO THE BUILDING 707
DECOMMISSIONING OPERATIONS PLAN – DCD-011-04

Pursuant to Section 4.0 of the Building 707 Decommissioning Operations Plan (DOP) and Paragraph 127 of the Rocky Flats Cleanup Agreement (RFCA), the Kaiser-Hill Company, L.L.C. is submitting the attached minor modification for your approval and transmittal to the Colorado Department of Public Health and Environment (CDPHE).

COR. CONTROL	x	x
ADMN. RECORD	x	x
WASTE REC. CTR.		
TRAFFIC		
PATS/130		

This modification to the DOP includes:

- Changing all references to "3 ft. below grade" to "3 ft below final grade" for consistency
- Changing removal of contaminated portions of the building shell to "before or after" demolition (currently says prior to demolition)
- Revising the ER interface section to specify criteria for removing or leaving the process waste lines (currently says all lines below the slab will be removed).

CLASSIFICATION:		
UCNI		
UNCLASSIFIED	x	x
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER

David Del Vecchio
10/27/04
Date

If you have any questions, please contact Carolyn Hicks at 303-994-9555.

IN REPLY TO RFP CC NO.

ACTION ITEM STATUS

☐ PARTIALLY OPEN

☐ CLOSED

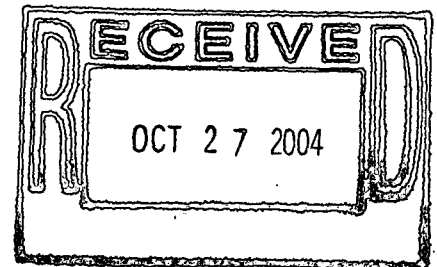
LTR APPROVALS

ORIG # TYPIST INITIALS

David Del Vecchio
David Del Vecchio
Closure Project Manager
Buildings 707/776/777

Attachment:
As stated

cc:
Frazer R. Lockhart
Gary Schuetz





October 28, 2004

04-RF-01107

RFPO Project Management
Joseph A. Legare, Director
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David Del Vecchio
Closure Project Manager
Buildings 707/776/777

Attachment:
As stated

cc:
Frazer R. Lockhart
Gary Schuetz

Building 707 Decommissioning Operations Plan, Modification #3

Requested Changes

The proposed changes to the 707 DOP are identified by section and page number. Additions are shown in italics and deletions shown in ~~strikeout~~.

- 1) Section 4.3, Set Identification and Prioritization, Set 16, page 33: Please change as shown to specify "final grade".

Set 16 covers the final survey and demolition of the Type 3 and Type 2 buildings, including removal of the slabs, basement walls, and floors to a depth at least three feet below *final* grade (see Section 4.5). Activities conducted within the scope of this Set will be coordinated with the ER Program.

- 2) Section 4.4.7, Removal of Contaminated Portions of the Building Shell, page 66: Please change the second sentence as shown. The CDPHE project representative has agreed with this minor modification as documented in a Contact Record between Edd Kray and Dyan Foss dated October 6, 2004.

It is the intent of DOE and its contractor to decontaminate all contaminated portions of the building shell (i.e., walls, floors, ceilings, roofs, and other structural members) to meet the applicable criteria for unrestricted release demolition in accordance with the RSOP for Facility Disposition. However, in the event the material disposition analysis shows that decontamination will pose a significant risk to workers and/or public health and safety and the environment, or decontamination is not economically feasible, the Building 707 Closure Project POC and the DOE POC will consult with the LRA POC to determine whether the contaminated portion of the shell should be removed ~~prior to~~ *before or after* demolition. If, after reviewing the applicable survey data and considering relative risks, the Building 707 Closure Project POC, DOE POC, and LRA POC agree that removal is the safest, most protective option, the work will be planned as described below. In addition, prior to execution of the planned removal activity, the Building 707 Closure Project POC and DOE POC will conduct special project status meetings as necessary to address stakeholder concerns and provide a detailed description of the activity, methods to be used, and scheduled date(s).

- 3) Section 4.5, Facility Demolition, page 69: Please change as shown to specify "final grade".

The demolition phase of decommissioning includes removal of the building shell, slab, foundation or facility footing to a depth at least three feet below ~~ground surface~~ *final grade*. The soil beneath the facility is not within the scope of this DOP. It will be addressed during the ER phase of the Building 707 Closure Project.

- 4) Section 4.5.2, Demolition Planning and Execution, page 71: Please change as shown to specify "final grade".

The general sequence of activities associated with the demolition of facilities within the Building 707 Closure Project will proceed as follows:

- Mobilization,
- Demolition site preparation,
- Removal of overhead obstructions,
- Removal of Site features required to execute demolition (paved lots and streets for ease of access, retaining walls, inactive exterior fire system components),
- Demolition of outbuildings and Site features (e.g., cooling towers, trailers, tanks, outbuildings, ASTs),
- Demolition of Building 707 to a depth at least three feet below *final grade*,
- Placement of an engineered backfill of the Building 707 footprint,
- Demolition site cleanup, and
- Demobilization.

- 5) Page 4.6, Interfaces with Environmental Restoration, page 80: Please change as shown to clarify criteria for leaving or removing process waste lines beneath floor slabs. This makes the 707 DOP consistent with the approved approach for managing these lines across site.

Decommissioning activities performed within the scope of this DOP will be coordinated with activities performed within the scope of the ER RSOP or other ER decision document to achieve an integrated process that minimizes risk to workers and the environment, minimizes the generation of remediation wastes, streamlines technical processes, and reduces Building 707 Closure Project costs. Project interface points will be as follows:

- Generally, the ER schedule will be integrated with the decommissioning schedule to allow for the planning and initiation of ER characterization activities during facility decommissioning.
- Demolition and ER activities will proceed as an uninterrupted two-phase operation culminating in closeout of the associated IHSSs, PACs and UBC sites.
- During decommissioning:
 - Electrical and water lines will be removed. Underground utility lines located outside the facility footprint will be left in a stable condition. A map showing the locations and sources of these utility lines will be maintained in the Building 707 Closure Project files and provided to the ER Program.
 - Process waste lines, tanks, and other lines associated with the process waste transfer system (ie., the "new" process waste lines) and any "old" process waste lines will be removed *to the building slab. and/or isolated at the facility perimeter.* A map, showing the locations and sources of the process waste lines will be maintained in the Building 707 Closure Project Files and provided to the ER Program.
 - Sanitary sewer lines, tanks, and ancillary equipment will be flushed with clean water and removed ~~to the nearest isolation valve.~~ *three feet below final grade.*
 - Structural material within three feet of the proposed final grade will be removed, including building slabs and foundations, unless otherwise required due to ER remediation requirements.
 - Structures below three feet of the proposed final grade will be removed ~~when the structure prevents access to contaminated soil, or when if the structure does not meet the applicable unrestricted release criteria (see Table 4).~~ *This includes removal. Removal activities will include removal of the foundation and at least three feet of the associated footing/pilings. Any remaining footings/pilings will be assessed and removed (if required) during ER activities.*
- During ER
 - Sidewalks, driveways, and roads outside the facility footprint will be removed.
 - *As described in RFCA Attachment 14, all original process waste lines (OPWL) will be removed to a depth of 3 feet below existing or final grade, whichever is greater. If contaminated soil associated with the OPWL exceeds 3 nCi/g between 3 and 6 feet, or if the volume of associated contaminated soil exceeds the Attachment 14, Table A14-1 values, then contaminated soil and associated OPWL will be removed until the soils are less than 1 nCi/g.*
 - *OPWL that are left in place will be grouted as completely as possible. If the ends are already grouted or plugged they will not*

be re-opened for grouting unless they are disturbed during slab removal activities. Sections of the OPWL that are exposed during building demolition or other excavation activities will be removed to the extent practicable, even if below three feet, and the remaining lines will be grouted.

- *New process waste lines (NPWL) located beneath floor slabs will be removed to a depth of 3 feet below existing or final grade, whichever is greater, along with associated contaminated soil (if present). NPWL that cannot be clean closed under RCRA will also be removed. If contaminated soil associated with the NPWL exceeds the RFCA Attachment 5 values, then it will be removed to a depth of 6 feet below existing or final grade or until the soils are less than 1 nCi/g.*
- *If necessary, underground utility lines located outside the facility footprint will be removed if they are uncovered during remediation activities. Open ends of water and sewer lines will be grouted.*
- *Additional structures remaining after removal to below three feet of the proposed final grade will be addressed (ie., they will be left in place if uncontaminated; removed if contaminated); removed if required to access and remediate contaminated soil.*
- ~~*The effects of remaining subsurface structures (e.g., utility and pipeline corridors, building slabs, foundations, drains) will be evaluated and reported in the Site Water Balance Study.*~~
- *The Industrial Area Plume in this area will be evaluated and remediated as required as part of the GW IM/IRA.*
- ~~*"White spaces" (i.e., areas without contamination) will*~~ *Soil in additional locations may be sampled and/or remediated, as necessary, when-if monitoring data indicate that contamination was spread during remediation of adjacent areas.*

In the event there is a gap between decommissioning and remediation activities, the RISS Project will be responsible for surveillance and maintenance activities associated with the building slab. The hand-off from decommissioning to the landlord organization will be documented in writing, by the Decommissioning Project, and RISS Project, and ER Program.